

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**
Plaintiff,

v.

CANON INC.,
Defendant.

**CIVIL ACTION 6:20-cv-00980-ADA
CIVIL ACTION 6:20-cv-00981-ADA
CIVIL ACTION 6:20-cv-00982-ADA**

CANON INC.,
Third-Party Plaintiff,

v.

NXP USA, INC.,
Third-Party Defendant.

CIVIL ACTION 6:20-cv-00980-ADA

**JOINT MOTION FOR EXTENSION OF TIME CONCERNING FINAL
INFRINGEMENT AND INVALIDITY CONTENTIONS DEADLINE**

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC (“WSOU”), Defendant Canon, Inc. (“Canon”), and third-party Defendant NXP USA, Inc. (“NXP”) (collectively, the “Parties”) submit this Joint Motion and respectfully request the Court grant the extension of time outlined below. On July 19, the Court entered an Agreed Amended Scheduling Order. ECF No. 33. However, the deadline for Final Infringement and Invalidity Contentions is only four days after the Markman hearing. *See* ECF No. 33 (November 5, 2021 *Markman* hearing; November 9, 2021 deadline for final infringement and invalidity contentions). Thus, the Parties respectfully request to adjust the

Scheduling Order to better align the case schedule with the Court's current OGP and to better afford the Parties the time needed to adequately prepare their final infringement and invalidity contentions. The Parties respectfully request the Court grant an extension of time for the following deadlines:

Deadline to serve Final Infringement and Invalidity Contentions: December 17, 2021.

Date: August 5, 2021

/s/ Jonathan K. Waldrop

Jonathan K. Waldrop (CA Bar No. 297903)

(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)

(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)

(Admitted in this District)

mbarber@kasowitz.com

John W. Downing (CA Bar No. 252850)

(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)

(Admitted in this District)

hkim@kasowitz.com

Jack Shaw (CA Bar No. 309382)

(Admitted in this District)

jshaw@kasowitz.com

KASOWITZ BENSON TORRES LLP

333 Twin Dolphin Drive, Suite 200

Redwood Shores, California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5171

Mark D. Siegmund (TX Bar No. 24117055)

mark@waltfairpllc.com

LAW FIRM OF WALT FAIR, PLLC

1508 N. Valley Mills Drive

Waco, TX 76710

Telephone: (254) 772-6400

Facsimile: (254) 772-6432

ATTORNEYS FOR PLAINTIFF

WSOU INVESTMENTS, LLC

**d/b/a BRAZOS LICENSING AND
DEVELOPMENT**

Respectfully submitted,

/s/ John M. Jackson

John M. Jackson (Texas Bar No. 24002340)

jjackson@jw.com

JACKSON WALKER, LLP

2323 Ross Avenue, Suite 600

Dallas, TX 75201

Tel: (214) 953-6000

Fax: (214) 953-5822

Joseph A. Calvaruso (*pro hac vice*)

jcalvaruso@orrick.com

Richard F. Martinelli (*pro hac vice*)

rmartinelli@orrick.com

ORRICK, HERRINGTON & SUTCLIFFE LLP

51 West 52nd Street

New York, NY 10019-6142

Tel: (212) 506-5000

Fax: (212) 506-5151

ATTORNEYS FOR DEFENDANT

CANON INC.

By: /s/ Richard S. Zembek

Richard S. Zembek (SBN 00797726)

richard.zembek@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP

Fulbright Tower

1301 McKinney, Suite 5100

Houston, Texas 77010-3095

Tel: (713) 651-5151

Fax: (713) 651-5246

Adam Schramek (SBN 24033045)

adam.schramek@nortonrosefulbright.com

Eric C. Green (SBN 24069824)

eric.green@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP

98 San Jacinto Boulevard, Suite 1100

Austin, Texas 78701

Tel: (512) 474-5201

Fax: (512) 536-4598

COUNSEL FOR THIRD-PARTY

DEFENDANT NXP USA, INC.

